



DAVIDOFF HUTCHER & CITRON LLP

ATTORNEYS AT LAW
605 THIRD AVENUE
NEW YORK, NEW YORK 10158

TEL: (212) 557-7200
FAX: (212) 286-1884
WWW.DHCLLEGAL.COM

FIRM OFFICES
GARDEN CITY
ATTORNEYS AT LAW
200 GARDEN CITY PLAZA
GARDEN CITY, NY 11530
(516) 248-6400

ALBANY
GOVERNMENT RELATIONS
150 STATE STREET
ALBANY, NY 12207
(518) 465-8230

WASHINGTON, D.C.
GOVERNMENT RELATIONS
201 MASSACHUSETTS AVENUE N.E.
WASHINGTON, D.C. 20002
(202) 347-1117

March 4, 2020

Via ECF and Email

Honorable Robert D. Drain
United States Bankruptcy Court
300 Quarropas Street
White Plains, New York 10601

Re: In re Sears Holdings Corporation, et al., Case No. 18-23538 (rdd)
Debtor's 11th Omnibus Objection to Claims

Dear Judge Drain:

I am responding to the Debtors' Certificate of No Objection [Doc. 7383] and request for the entry of default judgments against thirty-five (35) out of fifty-seven (57) claims subject to the debtors' Eleventh Omnibus Objection to Claims ("11th Omnibus Claim Objection") [Doc 7213]. The Court should consider adjourning the matter until the March 23rd omnibus hearing.

Notably, many of the claimants whose claims are at issue appear to be vendors located in China and other foreign jurisdictions, some of whom are likely in a Coronavirus quarantine. Whether these creditors received notice from the Debtors of the 11th Omnibus Claim Objection or are in a position to respond in a timely fashion, is unknown and probably unknowable at this time. However, given what we know is going on in that part of the world, with entire cities in a quarantine, it would appear unseemly to enter defaults against these claimants. Moreover, the Court is scheduled to hear oral argument on the "World Imports" issue, which underlies the 11th Omnibus Claim Objection (as well as the Debtor's Tenth Omnibus Claim Objection) in less than three weeks, at the March 23rd hearing.

On Monday, March 2nd, I requested that the Debtors extend the time for responses to the 11th Omnibus Claim Objection but this request was, effectively, denied.

This letter is not submitted on behalf of any creditor or party in interest.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David H. Wander".
David H. Wander

cc: Bryan Podzius, Esq. (via email)